PHA 5-Year and Annual Plan

U.S. Department of Housing and Urban Development Office of Public and Indian Housing

OMB No. 2577-0226 Expires 4/30/2011

1.0	PHA Information PHA Name: City of Hartford PHA Type: ☐ Small ☐ High PHA Fiscal Year Beginning: (MM/YYYY):	Performing July 1, 2010	☐ Standard	PHA Code: 0 X HCV (Section 8)	CT051			
2.0	Inventory (based on ACC units at time of F Number of PH units:	entory (based on ACC units at time of FY beginning in 1.0 above) nber of PH units: Number of HCV units: 4784						
3.0	Submission Type X 5-Year and Annual Plan	Annual P	lan Only	5-Year Plan Only				
4.0	PHA Consortia	HA Consortia	(Check box if submitting a join	nt Plan and complete table belo	ow.)			
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program			
	PHA 1:				PH	HCV		
	PHA 2:							
5.0	PHA 3: 5-Year Plan. Complete items 5.1 and 5.2 on	ly at 5-Year P	lan update.					
5.1	Mission. State the PHA's Mission for serving jurisdiction for the next five years: The mission of the PHA is the same as that of economic opportunity and a suitable living ending the period of the	f the Departm	ent of Housing and Urban Deve	•				

- **Goals and Objectives.** Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.
 - A. PHA Goal: Expand the supply of assisted housing

Objectives:

- Apply for additional rental vouchers if available
- B. PHA Goal: Improve the quality of assisted housing

Objectives:

- 1. Continue to improve and maintain voucher management: (SEMAP score) as High-performer
- 2. Maintain lease-up to 98% of budget utilization.
- 3. Continue to develop and maintain a rent reasonableness process to improve operational effectiveness.
- Continue to maintain centralized review process of Request for Tenancy Approvals submitted to ensure rental amounts and determinations of rent reasonableness are within scope of program standards.
- 5. Continue to develop relationships with more partners in the recruitment and retention of landlords.
- Continue to increase customer satisfaction.
- 7. Concentrate on efforts to improve specific management functions:
 - Continue to develop training for Occupancy Specialist staff.
 - b. Continue to develop training for Housing Inspection staff.
- 8. Continue to promote awareness to program participants of the dangers of lead poisoning hazards by providing handout material during orientations and re-certifications (supported by case file documentation).

 Since previous 5-Year Plan submission, we partnered with Healthy Homes to augment our voucher holders' orientations in order
- C. PHA Goal: Increase assisted housing choices

Objectives:

1. Continue to conduct outreach efforts to potential landlords.

for them to present information on lead hazards.

- 2. Continue to provide Section 8 voucher mobility counseling.
- 3. Continue to review the need to increase voucher payment standards annually.
- D. PHA Goal: Ensure equal opportunity and affirmatively further fair housing

Objectives:

- 1. Continue to undertake affirmative measures to ensure access to assisted housing regardless of race, color, religion, national origin, sex, familial status, and disability.
- Continue to undertake affirmative measures to provide a suitable living environment for families living in assisted housing, regardless of race, color, religion, national origin, sex, familial status, and disability.
- Continue to undertake affirmative measures to ensure accessible housing to persons with all varieties of disabilities regardless of unit size required.
- 4. Continue on-going efforts to educate and provide information to the general population and to landlords.
- 5. Conduct on-going training to educate staff.
- 6. Continue to implement Section 504.
- 7. Continue to Implement the Limited English Proficiency (LEP) plan for applicants and residents of the Section 8 program.
- 8. Continue to affirmatively further fair housing.
- 9. Continue to comply with the Violence Against Women Act to support and assist victims of domestic violence, dating violence, sexual assault, or stalking. To protect certain victims as well as members of the victims' immediate families from losing their HUD-assisted housing as a consequence of the abuse of which they were the victim.
- E. PHA Goal: Implement Homeownership Program

Objectives:

- 1. Continue to administer the Homeownership Program to accommodate twenty-five eligible families.
- Continue to partner with Connecticut Housing Finance Authority (CHFA) and their Section 8 Homeownership mortgage programs to provide the homeownership counseling for qualified families.
- 3. Continue to screen for eligibility criteria.
- 4. Continue to conduct orientation sessions to explain the program.
- 5. Continue to refer participants to housing counseling agencies.
- 6. Continue to issue homeownership option vouchers.
- 7. Continue to review all paperwork and conduct necessary inspections on home.
- 8. Continue to initiate homeownership payments.
- F. PHA Goal: Use of Project-Based Voucher Program

Objectives:

- 1. Continue to operate a Section 8 Project Based Voucher program.
- 2. Continue to support the City of Hartford initiative in administering the Grand Families program.
- Continue to utilize and plan on project basing specific numbers of Section 8 vouchers according to HUD regulations and NOFA specifications.
- G. Other PHA Goals and Objectives:
 - Continue with on-going accounting system efforts for recovery collection of tenant fraud recovery for the Section 8 program along with policies and procedures.
 - 2. Continue to evaluate and upgrade computer software to improve financial accounting and reporting.

6.0 PHA Plan Update

- (a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:
- Eligibility, Selection and Admissions Policies, including De-concentration and Wait List Procedures. No changes since last Annual Plan submission.
- 2. Financial Resources. No changes since last Annual Plan submission.
- 3. Rent Determination. No changes since last Annual Plan submission.
- 4. Operation and Management. No changes since last Annual Plan submission.
- 5. Grievance Procedures. No changes since last Annual Plan submission.
- 6. Designated Housing for Elderly and Disabled Families. N/A.
- 7. Community Service and Self-Sufficiency. N/A.
- 8. Safety and Crime Prevention. N/A.
- Pets. N/A.
- 10. Civil Rights Certification. No changes since last Annual Plan submission.
- 11. Fiscal Year Audit. No findings were reported in our most recent audit.
- 12. Asset Management. N/A.
- 13. Violence Against Women Act (VAWA).

The City of Hartford Department of Housing & Community Development (DOHCD) policies and procedures incorporate the laws and requirements outlined in the Violence Against Women Act (VAWA).

- DOHCD will continue its efforts to support and assist children and adult victims of domestic violence, dating violence, sexual assault, and stalking and will continue to establish collaborative programs with domestic violence service providers.
- DOHCD will inform all program participants of their rights under VAWA.
- DOHCD will inform property owners of their rights and responsibilities in regards to VAWA.
- DOHCD will develop policies and procedures to allow victims of domestic violence, dating violence, sexual assault and stalking an
 opportunity to claim their status as a victim.
- Any information provided by the victim will be kept confidential and will not be shared with other related agencies unless requested or consented to by the victim in writing, required for use in an eviction proceeding of an abuser, stalker or perpetrator of domestic violence, or is otherwise required by applicable law.
- DOHCD's procedures will ensure that it does not deny admission or terminate assistance, tenancy or occupancy rights of such victims
 and their immediate family members when the reason for denial/termination is directly related to such violence, unless the member is the
 perpetrator.
- DOHCD will ensure that employee training content includes the protections provided by VAWA and DOHCD's policies and definitions
 in regards to victims of domestic violence, dating violence, sexual assault and stalking.

DOHCD has incorporated language in its Administrative Plan with regard to admissions and continued occupancy policies to support victims of domestic violence, dating violence, sexual assault or stalking.

- (b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.
 - City of Hartford Department of Development Services Housing and Property Management Division 250 Constitution Plaza – 4th fl, Hartford, Connecticut 06103
 - City of Hartford website: www.hartford.gov
 - Imagineers, LLC
 - 635 Farmington Avenue, Hartford, Connecticut 06105
 - Hartford Public Library (during time period of public notice and public hearing)
 500 Main Street, Hartford, Connecticut 06103

Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership 7.0 **Programs, and Project-based Vouchers.** Include statements related to these programs as applicable. Project-based Vouchers: Based on HUD's regulations to allow communities, such as Hartford, participating in the Housing Choice Voucher Program to allocate up to 20% of their tenant-based vouchers for Project-Based Assistance, the City of Hartford DOHCD is planning in the near future to initiate a NOFA to allow for a specific number of rental subsidies to be attached to specific rental units which will undergo at least moderate rehabilitation and to also furnish a resource by which communities may provide housing for persons with special needs. Homeownership Program: The City of Hartford DOHCD implemented the administration of the Housing Choice Voucher Homeownership program. The DOHCD partnered with Connecticut Housing Finance Authority (CHFA) and their Section 8 Homeownership mortgage programs to provide the homeownership counseling for qualified families. DOHCD plans to initially administer the Homeownership Program to accommodate twenty-five eligible families. Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable. 8.0 Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually 8.1 complete and submit the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1, for each current and open CFP grant and CFFP financing. Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the Capital Fund 8.2 Program Five-Year Action Plan, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan. Capital Fund Financing Program (CFFP). 8.3 Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements. 9.0 Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location. The median family income in Hartford is \$27,051, mean family income is \$37,978, and per capita income is \$13,428. The percentage of individuals living below the poverty level is 30.6%, which equates to 7,748 families. Hartford contains 15-17 residential neighborhoods. The Hartford Eligible Metropolitan Statistical Area (EMSA) median family income (MFI) is \$75,350. Income data for Hartford shows significant differences between the City and the surrounding 29 towns in the Capitol Region. While the median income for the Capital Region was \$53,305, the median income for the City of Hartford was \$24,820. Hartford's median income was 47% of the Capital Region's median income. Seven of the 29 towns in the region had median household incomes that were three times higher than Hartford's. While the percentage of those living in poverty was 9% for the Capitol Region, it was 30.6% for the City. The poverty rate of families with a female head of household was 40.8%. 57% of those living in the Capitol Region with incomes below the poverty level lived in the City of Based on the 2000 Census there were a total of 50,644 housing units in the City of Hartford in 2000, 89% (44,986) of these units were occupied. The 11% unoccupied housing is boarded-up buildings, residents in transition and units that are empty due to the lag time between one tenant leaving and another tenant moving in. Hartford lost 6,478 occupied housing units between 1990 and 2000. Of these, 1,084 (17%) were owner-occupied units and 5,394 (83%) were renter-occupied. Hartford has the second lowest homeownership rate in the country at 25%. The ownership rate for the Capitol Region was 66%. 63% of the City's housing stock was built prior to 1959. 81% of Hartford's housing stock is in structures with 2 or more units. 36% of Hartford's housing stock - 33% rental and 3% owner - are subsidized. 47% of all assisted units in the Capitol Region are located in Hartford. The median value of a home in Hartford in 2000 was \$93,900. The median home value in the Capitol Region was \$151,220. The median gross rent in the City was \$560. In suburban communities, it was \$843 and the median for the region was \$676. During the last opening of the City of Hartford Housing Choice Voucher program waiting list over 10,000 qualified applicants were received during

a three week application period.

Strategy for Addressing Housing Needs. Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.

Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.

Housing Needs of Families in the Jurisdiction by Family Type							
Family Type	Overall	Afford- ability	Supply	Quality	Access- ibility	Size	Loca-tion
Income <= 30% of AMI (<\$13,650)	16,101	NA	NA	NA	NA	4	City
Income >30% but <=50% of AMI (>\$13,651, <=\$22,600)	8,264	NA	NA	NA	NA	4	City
Income >50% but <80% of AMI (>\$22,601, <=36,400)	6,824	NA	NA	NA	NA	4	City
Elderly population	6,151	NA	NA	NA	NA	NA	NA
Individuals with Disabilities	8,460	NA	NA	NA	NA	NA	NA
White/non-Hispanic	21,677	NA	NA	NA	NA	NA	NA
Black/non-Hispanic	49,412	NA	NA	NA	NA	NA	NA
Hispanic	49,260	NA	NA	NA	NA	NA	NA
Other	?	NA	NA	NA	NA	NA	NA

2000 Census Total Population: 121,578 Median Family Income: \$27,051

Housing Needs of Families on the Section 8 Tenant-based Waiting List					
	# of families	% of total families	Annual Turnover		
Waiting list total	4438		~250		
Extremely low income <=30% AMI	4224	95.18%			
Very low income	214	4.82%			
(>30% but <=50% AMI)					
Low income	0	0%			
(>50% but <80% AMI)					
Single	970	21.86%			
Families with children	2781	62.66%			
Elderly families	125	2.82%			
Families with Disabilities	562	12.66%			
Race/ethnicity=American Indian/Alaska					
Native	11	0.25%			
Race/ethnicity=Asian	73	1.64%			
Race/ethnicity=Black/African American	1608	36.23%			
Race/ethnicity=Native Hawaiian/Other					
Islander	5	0.11%			
Race/ethnicity=White	2554	57.55%			
Race= not indicated	187	4.22%			
Hispanic	2218	49.98%			
Non-Hispanic	2019	45.49%			
Ethnicity=Non-indicated	201	4.53%			

The City of Hartford DOHCD's waiting list has been closed since 11/21/2007 and does not expect to reopen it until the waiting list has been exhausted. The HA may admit an applicant for participation in the program as a special admission under HUD special a wards; project-based assistance or FUP if awarded.

1. A summary of the significant HUD funding changes in FY05 to the City of Hartford Section 8 Housing Voucher Program and the resulting administrative policy adjustments and objectives.

Under the FY05 Consolidated Appropriation Act, HUD will no longer guarantee program funding according to the maximum number of families the City's program is authorized to have under its Annual Contribution Contract (ACC); formerly 4,279 units. Going forward, HUD will only provide a fixed annual budgeted dollar amount that requires that the program housing assistance payment (HAP) costs and program enrollment level be managed so as to stay within the funding that is provided by HUD.

9.1

Funding for the program in FY05 was reduced by \$1.1M from the FY04 level (total amount funded in FY05 is \$29.4M vs. \$30.5M in FY04). HUD's method of determining 2005 funding for all Section 8 programs nationally was to take the May-July 2004 average monthly program cost data, adjust by HUD's applicable annual adjustment factor (AAF) and then apply a 4% reduction to each program regardless of the adequacy of the resulting funds. Due to this funding reduction, FY05 funds are estimated to subsidize about 80 fewer vouchers a month than the City was formerly authorized under ACC (or 4,199 units - which can afford to be funded vs. 4,279 units - the City is authorized). Fortunately, the reduction will not result in any current program families having to be taken off the program, due to advanced planning and use of normal program attrition. Unfortunately, according to HUD's guidance, we can not make use of the previously authorized units without a reduction in the programs HAP costs.

In addition to the HUD funding cuts, the reserves for the program have also been reduced from 2.4M to .05M and there is no appeal mechanism for the adequacy of the AAF that determined FY05 funding; in FY04 the City of Hartford was successful in obtaining 349K through an appeal of the AAF. There is no central fund in FY05 to support additional leasing and, for the first time, HUD policy states that program reserves that are expended will not be restored by HUD for subsequent funding years. HUD's guidance on these funding changes suggests that HAP costs will need to be managed though administrative policies to stay within current and future budget constraints and/or for additional families to be assisted. The average monthly HAP cost for the Hartford program is influenced by factors that are not always controllable, for example: changes to rent levels or utility rates in the market; tenant income levels and HUD's mandated requirement to reserve 75% of new admission for extremely low-income families (ELI is defined as those families at or below 30% of the area median income).

The City of Hartford Section 8 Voucher program will follow HUD's suggested guidance to help contain HAP costs through the following approaches: 1.) Adequately manage program enrollment levels to utilize between 98% and 100% of available budget appropriation by forecasting program HAP costs against HUD approved funding to make necessary adjustments in the program enrollment level; 2.) Maintain program reserves as emergency reserves since this funding is not restored by HUD and HAP costs are hard to forecast; 3.) Continue to review landlord rents for reasonableness by conducting individual unit determinations with a new market rent survey and where appropriate adjusts rents accordingly; 4.) Continue the \$50 minimum rent requirement for those families that don't qualify for a waiver exemption; 5.) Where appropriate reduce program payment standards levels and monitor to ensure overall rent burden is not excessive and within HUD benchmark standards; and 6.) When absolutely necessary to stay within HUD funding constraints, reduce the program enrollment level but only through normal attrition.

- 2. Develop more comprehensive rental survey data to assist in rent reasonableness determinations and need for exception rents or higher or lower payment standards using the following strategies:
 - Routinely review payment standard levels to determine the appropriate level that maximizes both adequate housing choices without reducing total number of rental subsidies.
 - Monitor to ensure overall tenant rent burden is not excessive and within HUD benchmark standards.
 - Develop rental survey data to review the adequacy of payment standard levels.
 - Track rental information on cases where apartment units became ineligible for program participation due to rent being too high for client. Compile this information and analyze to determine if higher payment standards are necessary.
- 3. Continue to expand the Housing Choice Voucher Homeownership program to support homeownership goals and continue to advertise to eligible program participants.
- 4. Maximize enrollment and housing choice opportunities based on funding availability (ongoing).
- 5. Develop a more comprehensive listing of handicap accessible units using the following strategies:
 - Continue to assign a specific staff person to coordinate identification and dissemination of known or available handicap accessible units.
 - Continue to identify possible agencies that might have listings of handicapped accessible units.
 - Continue to have program staff identify handicap accessible units through normal program operation and forward information to staff
 person responsible for maintaining list.
 - Continue to ensure that property owners that list vacant apartments are screened to determine if the units are handicap accessible and if so identify them in that manner.
 - Continue and expand the handicap accessible handout for interested clients with a comprehensive listing of known units (not necessarily vacant).
- 6. Apply for additional section 8 units; special-purpose vouchers targeted to families with disabilities or the elderly should they become available.
- 7. Exceed HUD federal targeting requirements for families at or below 30% of AMI in tenant-based section 8 assistance.
- 8. Affirmatively market to races/ethnicities shown to have disproportionate housing needs.
- 9. Counsel section 8 tenants as to location of units outside of areas of poverty or minority concentrations.

- 10.0 Additional Information. Describe the following, as well as any additional information HUD has requested.
 - (a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5-Year Plan.

The City of Hartford Department of Housing & Community Development (DOHCD) has made steady progress toward meeting its goals outlined in the 5-Year plan.

The City of Hartford DOHCD submitted a funding application for 100 Family Unification Program (FUP) vouchers and partnered with the Department of Children and Families' Supportive Housing for Family programs and is awaiting a response from HUD. DOHCD had applied for 177 housing voucher units and 222 housing voucher units under the FY 2000 and FY 2001 Section 8 Fair Share NOFA in an effort to expand the supply of assisted housing. The City of Hartford DOHCD application for the fair share allocation for fiscal year 2000 and 2001 was approved and 100% lease-up of those units has been achieved. The City of Hartford also applied for 50 units of the 2003 Super NOFA for Section 8 mainstream housing opportunities for persons with disabilities. Although the City of Hartford application was a strong applicant for the program, the application was not funded due to overall NOFA funding constraints.

HUD has rated the City of Hartford Section 8 program administration as a high-performing PHA, through the Section Eight Management Assessment Program (SEMAP) scoring in fiscal year 2001,2002,2003, and 2004 or since HUD has implemented SEMAP scoring. The City of Hartford program continues to work to improve the quality of the tenant-based program by focusing on the management indicators provided in the SEMAP scoring.

The City of Hartford Housing Voucher program utilization rate has been consistently maintained at 100% to ensure that the maximum number of families receive program assistance. The high enrollment has been consistently achieved in direct contrast to overall difficulties experienced by PHA's locally and nationally. The City of Hartford continues to assist program participants in housing choices. Each voucher is notified of the full range of areas where they may lease units and explained portability. Apartment listings are provided when available. The booklet "Section 8 Housing Voucher's Handbook is provided to program participants to help assist their understanding of their full housing options. Currently, 26% percent or 1,201 households of the City of Hartford's (DOHCD) Section 8 Housing Choice Voucher program are practicing mobility by using their rental subsidies outside of Hartford through the Hartford mobility program. The current City of Hartford administrative plan does not include residency preferences. The City of Hartford is also a participant in the Regional Opportunity Counseling (ROC) program.

The City of Hartford (DOHCD) continues to work to further fair housing objectives. Specifically, the City of Hartford (DOHCD) has developed a more comprehensive listing of handicap units, conducted staff training on fair housing laws, increased payment standards above the FMR and developed strategies to improve the fair housing compliant and referral procedures.

The City of Hartford (DOHCD) promoted awareness of the dangers of lead poisoning hazards to program participants by providing additional handout material during orientation and recertification, as well as, sponsoring landlord workshops .

The City of Hartford (DOHCD) program has contracted with a qualified real estate appraiser to complete a survey of the rental market. The results of the rental survey have assisted in rent reasonableness determinations and the development of payment standards.

The City of Hartford Family Self Sufficiency (FSS) program has graduated 26 successful families during this plan period. Fifteen FSS participants have left the program successfully with escrow funds earned through the program and are pursuing overall work related or homeownership goals.

The City of Hartford (DOHCD) Housing Choice Voucher Homeownership Option program has been fully implemented as of May 2009. The first orientation session took place in August of 2009. The housing counseling agencies that have partnered with the DOHCD through CHFA are Co-Opportunity and HART. In December of 2009 there was one family that purchased a home and is currently receiving mortgage assistance through the program. There are approximately 25 participants going through the housing counseling sessions and one has been deemed mortgage ready and is in the process of being pre-approved.

- (b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"
 - a. Substantial Deviation from the 5-Year Plan Basic criteria used to determine a substantial deviation from 5-Year Plan and significant amendment or modification to 5-year plan and annual plan. The City of Hartford Housing Authority will consider the following definitions to be significant amendments or modifications to the 5-year plan and annual plan for the purposes of submitting a revised plan and meeting full public process requirements:
 - 1. Changes to admission policies.
 - 2. Changes to the organization of the waiting list.

(An exception may be made for any of the above definitions that are adopted by the City of Hartford Housing Authority in response to changes in HUD regulatory requirements.)

- b. Significant Amendment or Modification to the Annual Plan
 The City of Hartford Housing Authority will consider the following definition to be significant deviations to the 5-year plan and annual plan for the purposes of submitting a revised plan and meeting full public process requirements:
 - 1. Changes to the City of Hartford Housing Authority overall mission.
 - 2. Changes to the goals and objectives that affect services to program participants.

(An exception may be made for any of the above definitions that are adopted by the City of Hartford Housing Authority in response to changes in HUD regulatory requirements.)

- 11.0 Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.
 - (a) Form HUD-50077, PHA Certifications of Compliance with the PHA Plans and Related Regulations (which includes all certifications relating to Civil Rights)
 - (b) Form HUD-50070, Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)
 - (c) Form HUD-50071, Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)
 - (d) Form SF-LLL, Disclosure of Lobbying Activities (PHAs receiving CFP grants only)
 - (e) Form SF-LLL-A, Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)
 - (f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.
 - (g) Challenged Elements
 - (h) Form HUD-50075.1, Capital Fund Program Annual Statement/Performance and Evaluation Report (PHAs receiving CFP grants only)
 - (i) Form HUD-50075.2, Capital Fund Program Five-Year Action Plan (PHAs receiving CFP grants only)